



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

August 27, 2007

James L. Lowe, District Ranger  
Gauley Ranger District  
932 N. Fork Cherry Road  
Richwood, WV 26261

Re: Draft Environmental Impact Statement Lower Williams Project Area (LWPA), Vegetation Management and Wildlife Habitat Improvements, Monongahela National Forest July 2007  
Webster County, WV CEQ# 20070281

Dear Sir:

In accordance with the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act the United States Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. EPA has assigned this (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information. The basis for this rating is detailed in the comments provided below.

**Project Description:**

The Lower Williams Project Area (LWPA) consists of 14,397 acres within Webster County, West Virginia. Approximately 92% of the project area is National Forest Land and the remaining 8% is private land. The proposed action is to perform vegetation management and wildlife habitat improvements within the project area consistent with the 2006 Monongahela National Forest Plan. All of the Forest Service land in the project area is within Management Prescription (MP) 3.0. The Forest Plan standards and guidelines for management in MP 3.0 emphasize the even-aged system of silviculture when shade intolerant species such as oaks are the species objective. The forest plan recommends a mosaic of hardwood stands varying in size structure and species composition to provide habitat for a variety of wildlife species. Other habitat components called for in the forest plan include maintaining 3-8% of the area in permanent wildlife openings and retention or creation of permanent water sources. The purpose and need for this action is to:

- create early successional forest habitat and permanent openings to improve habitat for species such as deer, grouse, and squirrel;
- reduce the amount of competition between trees for light and water resources in dense

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- over crowded stands to provide for sustainable timber and mast production;
- Regenerate shade-intolerant tree species and diversity of forest age classes to improve the long-term sustainability of timber and increase the quality and growth rate of crop trees and mast producing trees.

### **Alternatives:**

According to the DEIS, during the scoping process, three major issues were identified: erosion and sedimentation, acid sensitive soils, and early successional habitat and openings. Five alternatives are considered in detail. These are Alternative 1 (No Build) and four action alternatives. Alternative 2 is the proposed action alternative presented to the public during scoping. Alternative 3 is a modified version of the proposed action to address the issues identified before and after scoping. Alternatives 4 and 5 address the issues raised by proposing less conventional logging, more helicopter logging, dropping units, and no new road construction.

Alternative 3 is the preferred alternative. According to the DEIS, Alternative 3 would effectively address the issues raised by the public and interdisciplinary team and move the project area close to the desired condition.

### **General Comments:**

The Preferred Alternative should be identified more clearly in the document. Alternative 2 is identified as the Proposed Alternative throughout the document and discussed in detail. This could lead the reader to assume that the Proposed Alternative (Alternative 2) is the Preferred Alternative (Alternative 3). In general the text describes impacts associated with the Proposed Alternative in greater detail than the Preferred Alternative. The DEIS should also discuss impacts associated with the Preferred Alternative in detail.

The DEIS states that impacts to forest interior habitat would last about 20 years until the canopy closes, depending on other activities in the project area. It also states that any effects are not expected to impact viability on a Forest-wide scale because approximately 176, 200 acres (20%) are managed to maintain forest interior characteristics. The DEIS should provide more information about the loss of forest interior habitat within the project area and the Forest and discuss efforts to promote and maintain forest interior habitat. Impacts associated with the preferred alternative should also be discussed in detail. This habitat is very important to wildlife and should be preserved. The build alternatives would temporarily remove or adversely alter between 947 to 1, 161 acres of habitat for species that use forested habitats.

Page 16, Table 4 lists activities considered in the cumulative effects discussion. It is not clear if these activities are located on Forest Service land or include private lands as well. The cumulative effects discussion should include all projects.

The status of the bald eagle should be updated, page 52.

The project team should coordinate with appropriate state and federal agencies regarding threatened, endangered, and other species of concern.

The DEIS should provide more information about avoidance, minimization, and

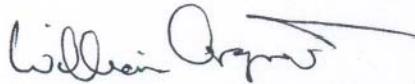


mitigation measures regarding invasive species, impacts to the aquatic environment and other environmental features. Page 85, Table 16 presents effects to plants measured by perennial stream crossing. No mention of other stream crossing numbers is included in the DEIS.

We would recommend the use of bridges or oversized culverts, time of year restrictions for some work, and fencing around sensitive areas where warranted.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,

A handwritten signature in black ink, appearing to read "William Arguto", with a long horizontal stroke extending to the right.

William Arguto,  
NEPA Team Leader



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